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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
JUNZO SUZUKI & PAUL SUZUKI,
Defendants.

) 2:15-cr-00198-GMN-NJK
)
)
)
)
**JOINT MOTION TO VACATE
PRETRIAL DEADLINES, CALENDAR
CALL, AND TRIAL DATE, AND FOR A
STATUS CONFERENCE**
)
)

The United States of America and Defendants Junzo Suzuki and Paul Suzuki, by and through their undersigned counsel, respectfully submit and request as follows:

That the Court schedule at its earliest convenience a status conference at which a continuance of trial can be discussed and a new trial date selected. Plea negotiations between the parties have ceased, and the parties expect this case to proceed to trial, which will take approximately three weeks. Counsel for the defendants have continued to diligently review

1 discovery provided by the government and prepare for a defense at trial. Counsel for the
2 defendants and the government anticipate needing to make motions for Rule 15 depositions of
3 witnesses in Japan. To allow sufficient time to schedule and take such depositions, a continuance
4 of trial will be needed. Furthermore, given the number of witnesses from Japan who will likely
5 need to travel to Las Vegas to testify on behalf of both the defense and the government, a firm trial
6 date will need to be selected, which may be complicated by the Court's current trial schedule in
7 *United States v. Palafox et al.*, 2:16-cr-265 (D. Nev.)

8 For the reasons discussed above, the parties jointly and respectfully request that the Court
9 vacate the current pretrial motions schedule, calendar call, and trial date, and schedule a status
10 conference to select new dates.

11 Dated: March 10, 2020

12 ROBERT ZINK
13 Chief, Fraud Section
Criminal Division,
14 United States Department of Justice

WRIGHT MARSH & LEVY

15 /s/
16 WILLIAM E. JOHNSTON
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18 NICHOLAS A. TRUTANICH
19 United States Attorney
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20 /s/
21 RICHARD ANTHONY LOPEZ
Assistant United States Attorney

JUNZI SUZUKI, ESQ.
Counsel for Defendants Junzo Suzuki and
Paul Suzuki

1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the United States Department of Justice, Criminal
3 Division, Fraud Section. A copy of this opposition memorandum was served upon counsel of
4 record, via Electronic Case Filing (ECF).

5

6 **DATED** this 10th day of March, 2020.

7 _____
8 /s/ William Johnston _____
9 WILLIAM JOHNSTON
10 Assistant Chief
11 Criminal Division, Fraud Section

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)
Plaintiff,) 2:15-cr-00198-GMN-NJK
v.) ORDER VACATING PRETRIAL
JUNZO SUZUKI & PAUL SUZUKI,) DEADLINES, CALENDAR CALL, AND
Defendants.) TRIAL DATE, AND SCHEDULING
) STATUS CONFERENCE
)

Before the Court is the parties' Joint Motion to Vacate Pretrial Motions Schedule, Calendar Call Date, and Trial Date, and for a Status Conference. Based upon the Court's review of the record, including the representations set forth in the joint motion, the Court hereby vacates the pretrial motions schedule, the calendar call, and the trial date, and schedules a status conference to occur on March 31, 2020 at 10:30 A.M.

Dated this 11 day of March, 2020.

Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT